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EXHIBIT 1

1	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF FLORIDA
2	PENSACOLA DIVISION
3	ALLIANCE LAUNDRY SYSTEMS LLC, Plaintiff,
4	vs. File No. 23-CV-22130 (MCR) TRUDY ADAMS, JOHN "CLAY" WILLIAMS
5	and AUTARKIC HOLDINGS, INC. D/B/A LAUNDRYLUX,
6	Defendants.
7	TRUDY ADAMS, JOHN "CLAY" WILLIAMS, Defendants/Counterclaim Plaintiffs,
8	vs. ALLIANCE LAUNDRY SYSTEMS LLC,
9	GREG REESE, MIKE HAND, and SAMANTHA BAKER,
10	Plaintiff/Counterclaim Defendants/ Third-Party Defendants.
11	
12	REMOTE VIDEO ZOOM DEPOSITION OF
13	MARK LANTERMAN
14	
15	DATE: February 11, 2025
16	TIME: 10:00 a.m. CT
17	PLACE: Videoconference
18	
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20	
21	
22	
23	
24	REPORTED BY: NANCY G. GISCH, RMR, CRR, CLR, CRC
25	(Via videoconference)

1	The videoconference deposition via
2	Zoom of MARK LANTERMAN, taken on February 11,
3	2025, commencing at approximately 10:00 a.m. CT,
4	before Nancy G. Gisch, Registered Merit Reporter,
5	Certified Realtime Reporter, Certified LiveNote
6	Reporter, Certified Realtime Captioner, a notary
7	public in and for the State of Wisconsin.
8	
9	APPEARANCES
10	(All appearances via videoconference)
11	
12	On behalf of the Plaintiff and Witness:
13	MELINDA GIFTOS, ESQ.
14	mindi.giftos@huschblackwell.com
15	Husch Blackwell, LLP
16	33 East Main Street
17	Suite 300
18	Madison, Wisconsin 53703
19	
20	
21	
22	(Appearances continued on next page.)
23	
24	
25	

1	On Behalf of Defendant Laundrylux:
2	DAVID WATNICK, ESQ.
3	dwatnick@perkinscoie.com
4	ADRIAN ALMAGUER, ESQ.
5	aalmaguer@perkinscoie.com
6	Perkins Coie LLP
7	1120 Northwest Couch Street
8	10th Floor
9	Portland, Oregon 97209
10	
11	On behalf of Trudy Adams and Clay Williams:
12	JURA ZIBAS, ESQ.
13	jura.zibas@wilsonelser.com
14	WILSON ELSER MOSKOWITZ
15	EDELMAN & DICKER, LLP
16	150 E 42nd Street, 23rd Floor
17	New York, New York 10017
18	
19	
2 0	
21	Also Present:
22	MATT SCHROEDER, Consultant
23	BRIAN CICCONE, Videographer
2 4	
2 5	

1		I N D E X
2	WITNESS	: MARK LANTERMAN PAGE
3		
4	EXAMINA	TION BY MR. WATNICK 7
5		
6	EXHIBITS	MARKED AND REFERRED TO:
7	EXHIBIT	1
8		Amended Expert Declaration of
9		Mark Lanterman
10	EXHIBIT	2
11		Upsala Transcripts
12	EXHIBIT	3
13		1/16/25 email to D. Watnick
14		from C. Horan
15	EXHIBIT	4
16		Plaintiff's Responses to Defendant
17		Laundrylux's Fifth Set of Document
18		Requests
19	EXHIBIT	5
20		Reddit "Ask Me Anything" thread
21	EXHIBIT	6
22		Affidavit of Mark Lanterman
23	EXHIBIT	7
24		Bench & Bar of Minnesota
25	(Exhibit	s continued on next page.)

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1
         Deposition transcript, rough draft
2
   3
         Adams laptop -- Axiom date filter.png
4
   EXHIBIT 10..... 177
5
         Screenshot from Axiom
6
7
8
   (Original exhibits attached to original
9
10
   transcript; copies to counsel.)
11
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1	consultant for PRG.
2	MS. GIFTOS: Mindi Giftos of Husch
3	Blackwell, representing Alliance Laundry Systems
4	LLC, the third-party I'm sorry the
5	third-party counter-defendants, and the witness,
6	Mark Lanterman.
7	MS. ZIBAS: Jura Zibas of Wilson
8	Elser, representing Trudy Adams and Clay
9	Williams.
10	VIDEOGRAPHER: Thank you.
11	Will the court reporter please swear in
12	the witness.
13	MARK LANTERMAN,
14	duly sworn, was examined and testified as follows:
15	VIDEOGRAPHER: You you may
16	proceed.
17	EXAMINATION
18	BY MR. WATNICK:
19	Q. Mr. Lanterman, can you please state your
20	full name for the record.
21	A. Mark Lanterman, L-A-N-T-E-R-M-A-N.
22	Q. Do you have a middle name?
23	A. Oh, I'm sorry. Yes. Tracey, T-R-A-C-E-Y.
24	Q. And have you ever used any other names?
25	A. No.

1	Does that make sense?
2	A. Yes.
3	Q. You can take a break whenever you need,
4	but if there's a question pending, you must
5	answer the question before the break is called
6	for.
7	Do you understand?
8	A. Yes.
9	Q. And you understand today that you're
10	testifying under oath?
11	A. Yes.
12	Q. Is there any reason that you're not able
13	to testify accurately today?
14	A. No.
15	Q. Are you under the influence of any drugs,
16	alcohol, or any other substance that affects your
17	ability to testify?
18	A. No.
19	Q. Okay. Where are you joining us from
20	today?
21	A. Medina, Minnesota. Just outside of
22	Minneapolis.
23	Q. Is that where you reside?
24	A. Yes.
25	Q. And are you coming to us from your home

1	today?
2	A. Yes.
3	Q. Is there anybody else in the room with
4	you?
5	A. No.
6	Q. Do you have any documents in the room with
7	you?
8	A. Yes.
9	Q. What documents are those?
10	A. I have a I have an iPad with a copy of
11	my report, but the iPad is off or excuse me,
12	it's it's locked.
13	And I have a manila folder that has two
14	documents. These are our chain of custody
15	documents. And I include or I wanted to have
16	them handy in case you asked when certain devices
17	arrived at my offices.
18	Q. Were
19	A. Other than that, I oh, I'm sorry.
20	Other than that, I I've no additional
21	documents here.
22	Q. Are those chain of custody documents
23	documents that were previously provided to
24	counsel for Alliance?
25	A. I don't know. My office may have provided

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1	A. No.
2	Q. Are there any mistakes included in this
3	resumé that you are aware of.
4	A. Not that I am aware of.
5	I think that there's something missing,
6	though.
7	Q. What is that?
8	A. In I think it was in December the
9	Arizona Supreme Court appointed me to the Court's
10	AI steering committee.
11	Q. I think that is reflected right here.
12	A. Oh, is it?
13	Oh, okay. Thank you. I I missed that.
14	Yep.
15	Q. Nothing on here that needs correction, as
16	far as you can tell?
17	A. No.
18	Q. So you say here you have a a bachelor's
19	of science a bachelor a I'll start over.
20	You say you have a BS in computer science
21	and an MS in computer science, both from Upsala
22	College.
23	Is that right?
24	A. Yes.
25	Q. What year did you earn each of those

1	degrees?
2	A. 1987 and 1989, I believe.
3	Q. Where is Upsala College located?
4	A. Well, it was located in East Orange,
5	New Jersey.
6	Q. It is no longer located there?
7	A. Correct.
8	Q. The college is no longer in existence. Is
9	that right?
10	A. That's correct. My understanding is the
11	state of New Jersey shut down the school.
12	Q. Do you know when that occurred?
13	A. I believe it was in the early 1990s, but
14	I I didn't really follow it.
15	Q. Shortly after your attendance?
16	A. Yes.
17	Q. What year did you start attending Upsala
18	College?
19	A. I believe that would have been September
20	or yeah, September of 1983.
21	Q. Were you had had you ever attended
22	any other college before that?
23	A. I took a distance learning class once.
24	Q. During high school, after high school?
25	A. In the in the I want to say it was

1	the summer after high school.
2	Q. And you began attending Upsala College in
3	September 1983. Had you just graduated from high
4	school the prior spring?
5	A. Yes.
6	Q. And did you live in East Orange,
7	New Jersey?
8	A. No.
9	Q. Where did you live?
10	A. Morristown, New Jersey.
11	Q. Morristown?
12	A. I Morris, with an M. I lived with my
13	grandparents.
14	Q. And did you live there for the entirety of
15	your attendance at Upsala College?
16	A. Yes.
17	Q. Did you begin working on your master's
18	upon finishing your bachelor's degree?
19	A. Yes.
20	Q. Were you a student there six years
21	consecutively?
22	A. Yes.
23	Q. Were you a full-time student for that
24	entire time?
25	A. I believe so, yes. I think it depends on

1	the number of credits I had. I I sometimes
2	couldn't afford as many credits as I would have
3	preferred to have taken, but I believe,
4	technically, yes, I was a full-time student.
5	Q. Do you remember your grade point average
6	when you completed your bachelor's degree?
7	A. No.
8	Q. Any guess?
9	A. No.
10	Q. Do you recall your master's degree
11	grade-point average?
12	A. No.
13	Q. No guess?
14	A. No.
15	Q. We talked about how Upsala College has
16	since closed. Do you know who maintains the
17	records of Upsala College?
18	A. No.
19	Q. Have you ever sought to procure any of the
20	records relating to your attendance at Upsala
21	College?
22	A. I did once, yes.
23	Q. When?
24	A. Probably a year or two years ago.
2.5	O. And what were the circumstances of that

1	Q. And what did you do after that?
2	A. I attempted to get the transcript. And I
3	was unable to.
4	Q. How did you attempt to get the transcript?
5	A. I think I googled, trying to find out how
6	to do that or, you know, how to track down
7	the the records.
8	And I forget who the custodian of the
9	records were, but I sent a an email. I never
10	heard back. So I sent a letter, requesting a
11	copy of my transcript. And I never heard back.
12	Q. Did you do anything other than that?
13	A. No.
14	Q. Do you have copies of diplomas that you
15	earned from Upsala College?
16	A. No.
17	Q. Did you ever have copies of diplomas?
18	A. Yes.
19	Q. When?
20	A. I think the last time I saw them would
21	have been in the early 1990s.
22	Q. What happened to them?
23	A. I well, I would have to speculate, but
24	I had them at my grandparents' apartment. And my
25	grandfather was very proud of that.

1	And I believe that when my grandparents
2	passed away I believe that their belongings
3	were thrown away.
4	Q. So the to the best of your
5	understanding, your diplomas would have been
6	thrown away?
7	A. I I don't know what would have happened
8	to them. I'm I'm guessing.
9	The the last time I saw my diplomas
10	they were at my grandparents' apartment in
11	Morristown.
12	Q. Were they framed and hanging on a wall?
13	A. They were framed. I don't know if they
14	were hanging or not.
15	Q. But you don't know what happened to them
16	after that?
17	A. No.
18	Q. I'm going to introduce Exhibit No. 2.
19	(Deposition Exhibit No. 2 introduced.)
20	Q. (By Mr. Watnick, continuing)
21	Mr. Lanterman, can you see this document?
22	A. Yes.
23	Q. This is a a web page that I accessed
24	and printed from Felician University of

New Jersey. You can see the URL down here.

1	"After multiple attempts to find this
2	file, we have not been able to locate this
3	student's transcript.
4	"I apologize for the inconvenience."
5	Do you see that?
6	A. I see that, yes.
7	Q. Do you have any idea why your transcripts
8	would not be available in the Upsala College
9	records?
10	A. No. Other than bad recordkeeping, which
11	is, I believe, the reason why the school was shut
12	down, to begin with. But I don't know why they
13	would not have my transcript.
14	Q. The school was shut down because of bad
15	recordkeeping?
16	A. My understanding is that there was bad
17	rec recordkeeping. And I think there were
18	allegations of financial fraud, having to do with
19	student loans.
20	But I once I was you know, once I
21	was done with school, I didn't really follow
22	follow Upsala College much.
23	Q. Do you have any documentary evidence
24	confirming your attendance at Upsala College?

A. I don't know. Not that I know of.

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you're being asked to investigate that?
1
                 MS. GIFTOS: Object to form.
 2
             (Continuing) Well, typ- -- typically my
 3
         Α.
     cases involve the analysis of data, yes.
 4
             Would you -- if you wanted to understand
 5
     what somebody did on a computer, would you rather
 6
     ask that person what they did or look at the data
 7
     on the computer?
 8
             I usually would want to look at the data.
 9
             Well, I -- I would analogize that to our
10
         0.
     situation, which -- my question for you is, why
11
     should anybody in our case be satisfied with your
12
     claims of attendance at Upsala College if you are
13
     not able to provide any written evidence of that?
14
             Yeah.
                    I -- I don't know how you would
15
         Α.
     expect me to answer that.
16
             I -- that's why I'm asking the question.
17
     I don't -- I -- I don't know what your answer
18
     would be.
19
             I mean, do you think that the parties in
20
     this case should just rely on your statement that
21
     you've attended Upsala College?
22
             Well, it's the truth.
2.3
         Α.
             And so we should just take that -- we
24
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should just take your word for it?

25

1	MS. GIFTOS: Objection; asked and
2	answered, argumentative.
3	A. (Continuing) That would be your decision.
4	Q. So reasonable to conclude, if we don't
5	believe you, that you didn't attend Upsala
6	College?
7	That's a
8	A. I
9	Q decision we could make?
10	A. Again, I can't I can't help you come to
11	your determination. I told you that I've that
12	I attended a Upsala College; I graduated from
13	Upsala College.
14	I had a long career in law enforcement, in
15	which I was subjected to multiple background
16	checks.
17	If you don't want to believe me, I
18	don't I don't know how, you know how I can
19	change your mind.
20	But I'm telling you that if if I if
21	I was going to fabricate a degree, I would have
22	chosen a better school; not one that was shut
23	down by the state of New Jersey for bad
2.4	recordkeeping practices and financial fraud.

Q. You wouldn't choose a school that doesn't

1	A. No, it's not a concern for for me. I
2	know I know what schooling I attended. I know
3	what degrees I earned. And my I don't know
4	what else you want me to say, other than that.
5	Q. I think, if it were me, I would perhaps go
6	to greater lengths to try and recover these
7	missing transcripts. I am surprised that there's
8	only been one email and one letter.
9	You've done nothing else to try and get
10	them?
11	MS. GIFTOS: Objection
12	A. (Continuing) No.
13	MS. GIFTOS: moment of counsel
14	testifying.
15	Q. (By Mr. Watnick, continuing) Your answer
16	was no?
17	A. My answer is no.
18	Q. So you know where you went to college.
19	Right?
20	A. Yes.
21	Q. And how are we supposed to know?
22	A. Well, because I told you.
23	Q. And that's everything?
24	A. That's everything.
25	Q. Okay. I want to look back at your resumé

25

Α.

office, yes.

1	Do you see that?
2	MS. GIFTOS: I'm going to object to
3	the extent it re it misstates the text being
4	read.
5	MR. WATNICK: If I misstated it, I
6	apologize. I mean, I think we can agree that the
7	document speaks for itself.
8	Q. (By Mr. Watnick, continuing) But you can
9	read it. Right, Mr. Lanterman?
10	A. I can see it, yes.
11	Q. Did Alliance communicate this request to
12	you?
13	MS. GIFTOS: I'm going to object to
14	the extent it's calling for attorney-client
15	privileged information.
16	MR. WATNICK: Mr. Lanterman is not
17	your client, is he?
18	MS. GIFTOS: Sorry. Excuse me.
19	Yes, you can proceed.
20	A. (Continuing) Could you ask me the question
21	again.
22	Q. Did Alliance communicate to you this
23	request?

I believe that they communicated it to my

1	Q. And did it reach you?
2	A. I was asked about this, yes.
3	Q. Did you give a response?
4	A. I did give a response.
5	Q. And what was your response?
6	A. That it was not readily available.
7	Q. Did you offer to look for it further?
8	A. I don't know if I did or not.
9	Q. Were there any other discussions with
10	Alliance about this request?
11	A. Not with me, no.
12	Q. Request No. 2 is the same question, just
13	with respect to the MS in computer science from
14	Upsala College.
15	And, again, it says, "Alliance has
16	communicated Defendants' Request" this is
17	"No. 1." I believe it meant to say "No. 2"
18	"to Mark Lanterman."
19	Is there any distinction between the
2 0	I'll start over.
21	Is is your answer the same for the MS
22	degree?
23	A. Yes.
24	Q. Okay. And then Request No. 3 says,
25	"Documents sufficient to show that Plaintiff's

1	A. I don't know.
2	Q. Do you want more
3	A. I may
4	Q time to think about it?
5	A. No, I don't need I don't need more time
6	to think about it. I attempted to in the past
7	and I was unsuccessful.
8	Q. And you're not going to try any other
9	avenue to recover them?
10	A. What other avenue?
11	Q. They are not my transcripts. I I'm not
12	sure what what efforts you might undertake.
13	I I think if they were, I would probably do
14	more, but I would probably get on the phone with
15	somebody at Felician. I if it were me, I
16	would probably do a lot, but it it if
17	you're not intending to make any further efforts,
18	I just want that to be clear in your testimony.
19	A. Yeah, I don't know what additional efforts
20	I'll take.
21	Q. Do you intend to make a renewed effort to
22	recover those transcripts in in time for trial
23	in this matter?
24	A. I don't know.

Q. What will it depend on?

25

1 Well, it -- I'm going to think about it. 2 And if I think I should, then I will. 3 Q. Do you think it would be wise for your business if that -- you had them? 4 5 Α. I don't know. 6 Do you recall whether the program you completed at Harvard was called "Cybersecurity; 7 the Intersection of Policy & Technology"? 8 I don't know. 9 MR. WATNICK: Okay. I'd like to take 10 a break now, if that works for everybody else. 11 12 MS. GIFTOS: Sure. VIDEOGRAPHER: Time is approximately 13 We are going off the video record. 14 11:21 a.m. (Recess from 11:21 a.m. to 11:33 a.m.) 15 VIDEOGRAPHER: Stand by, please. 16 Time is approximately 11:33 a.m. We are 17 18 back on the video record. 19 Go ahead. 20 MR. WATNICK: Thank you. 21 (Continuing) David, if I could, you know, during break I -- I thought about it. I -- I've 22 never had this come up in 30-some odd years. I 23 understand how important it is. I will reach out 24 to Upsala or the other school. I will make 25

1	Minnesota. Is that right?
2	A. Yes.
3	Q. Maybe let me start there. How long were
4	you a detective in Hopkins, Minnesota?
5	A. Well, I believe it would have been
6	from '92 to 2003. I was technically an employee
7	with the Hopkins Police Department, but I was
8	assigned to the U.S. Secret Service Electronic
9	Crimes Task Force and sworn in as a U.S. Marshal.
10	Q. I want go back to Hopkins for a minute.
11	You were a detective there beginning in 1992?
12	A. I believe so, yes.
13	Q. Is Hopkins in the Twin Cities area?
14	A. Yes.
15	Q. And what did you do before you were a
16	detective in Hopkins?
17	A. I was a police officer with the
18	Springfield Township Police Department in
19	Montgomery County, Pennsylvania.
20	Q. Where is Montgomery County, Pennsylvania?
21	What part of the state?
22	A. Southeast.
23	Q. Near Philadelphia?
24	A. It borders Philadelphia.

Q. And -- I'm sorry. What jurisdiction did

1	you say you were a police officer in?	
2	A. Springfield Township.	
3	Q. Springfield Township.	
4	How long were you a police officer there	?
5	A. I believe two years, maybe three years,	
6	before moving to Minnesota.	
7	Q. Was that your first job after your	
8	university studies?	
9	A. Yes and no. My my technically, my	
10	first job was I was self-employed. I would	
11	help companies build computers.	
12	Q. Your first external employment was as a	
13	police officer?	
14	A. Yes.	
15	Q. Did you need to attend a police academy?	
16	A. Yes.	
17	Q. Where did you attend the police academy?	
18	A. In I believe it was in Conshohocken.	
19	Q. Is that in Pennsylvania?	
2 0	A. Yes.	
21	Q. And were you how long were you in the	
22	academy?	
23	A. I don't recall how long that lasted. It	
24	was either six or nine months.	

Q. Was it a full-time academy?

25

1	A. Yes.
2	Q. And then, upon graduating, you took a job
3	as a police officer?
4	A. Well, I was hired before going to the
5	police academy, so I was I was paid full-time
6	wages while I went through training.
7	Q. And when you finished, the the
8	the the job was waiting for you
9	A. Yeah.
10	Q within the department?
11	Okay.
12	A. Yes.
13	Q. Did you investigate computer crimes while
14	you were a police officer?
15	A. Yes.
16	Q. Can you describe the the types of cases
17	that you saw?
18	A. I'm sorry. The types of?
19	Q. Cases that you investigated as a police
20	officer. And I'm just talking about Springfield
21	Township right now.
22	A. Oh, just Springfield Township?
23	You know, I think I only had I think I
24	only had one case at Springfield, as far as a 🖘
25	computer crimes go.

25 names?

1	A. I don't know. Wasn't what I was asked to
2	do.
3	Q. You attempted to form an opinion about
4	email activity conducted through those email
5	accounts.
6	Correct?
7	A. Correct.
8	Q. And would it be relevant if individuals
9	were continuing to access those accounts after
10	Ms. Adams or Mr. Williams left the company?
11	A. I don't know.
12	Q. You would need to explore further to
13	determine that?
14	A. Yes.
15	Q. But you didn't do that?
16	A. No.
17	Q. Mr. Lanterman, can you give me the name of
18	any students you attended Upsala College with?
19	A. Well, I lived with my grandparents. I
20	wasn't close to many people. No:
21	Q. What were the names of your grandparents?
22	A. Why?
23	Q. Your you've told us that's who you
24	lived with during college. Can you give me their

1	A. No. I'm not
2	Q. You're
3	A giving you my the names of my
4	grandparents.
5	Q. Will you tell us the address that you
6	lived at during college?
7	A. No.
8	Q. You're refusing?
9	A. Yes.
10	Q. And you're refusing to tell us who you
11	lived with?
12	A. No. I told you who I lived with. I lived
13	with my grandparents.
14	Q. But you won't give me their names?
15	A. No.
16	Q. And you can't tell me the name of any
17	other student you attended school with?
18	A. No. I didn't have a lot of friends. I
19	lived with my grandparents.
20	Q. Whose names you refuse to share?
21	MS. GIFTOS: David, what is the
22	relevance of his grandparents' names to his
23	expert analysis in this case?
24	MR. WATNICK: We intend to use this
25	information to try and determine whether the

REPORTER'S CERTIFICATE 1 STATE OF WISCONSIN 2 3 I hereby certify that I reported the videoconference deposition of MARK LANTERMAN, who 4 appeared remotely before me on February 11, 2025, and that the witness was by me first duly sworn 5 to tell the whole truth; 6 That the testimony was transcribed by me to the best of my ability and is a true record of 7 the testimony of the witness; that the right to read and sign was not reserved. 8 That the cost of the original has been 9 charged to the party who noticed the deposition, and that all parties who ordered copies have been 10 charged at the same rate for such copies; 11 That I am not a relative or employee or attorney or counsel of any of the parties, or 12 relative or employee of such attorney or counsel; 13 That I am not financially interested in the action and have no contract with the parties, 14 attorneys, or persons with an interest in the action that affects or has a substantial tendency 15 to affect my impartiality. 16 WITNESS MY HAND AND SEAL THIS 13th of 17 February, 2025. 18 19 20 Maricy & Stock 21 22 Nancy G. Gisch, RMR, CRR, CLR, CRC 23 Notary Public, State of Wisconsin

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My commission expires on 11/13/28

Federal Rules of Civil Procedure Rule 30

- (e) Review By the Witness; Changes.
- (1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:
- (A) to review the transcript or recording; and
- (B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.
- (2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

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